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Attorneys for Lenard E. Schwartzter, Trustee

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

MEDIZONE INTERNATIONAL, LLC,

Debtor.

Case No. BK-S-18-12662-LEB

Chapter 7

**OMNIBUS NOTICE OF HEARINGS
REGARDING:**

- 1) APPLICATION TO EMPLOY WILLIAM M. HOLLAND AS SPECIAL ACCOUNTANT;**
- 2) APPLICATION TO EMPLOY CASSAN MACLEAN AS SPECIAL LITIGATION COUNSEL FOR MAINTENANCE OF PATENT RIGHTS PURSUANT TO 11 U.S.C. §327(e);**
- 3) APPLICATION TO EMPLOY HOGAN LOVELLS US, LLP, AS SPECIAL LITIGATION COUNSEL FOR F.D.A. APPROVAL PROCESS PURSUANT TO 11 U.S.C. §327(e); AND**
- 4) MOTION TO LIMIT NOTICE AND ESTABLISH NOTICE PROCEDURE**

Date: July 19, 2018

Time: 11:00 a.m.

NOTICE IS HEREBY GIVEN that Lenard E. Schwartzter, Trustee (“Trustee”),¹ by and through his counsel, Schwartzter & McPherson Law Firm, has filed the following motions: (1) Application To Employ William M. Holland As Special Accountant [ECF No. 43] (“Holland Employment Application”); (2) Application To Employ Cassan Maclean As Special Litigation Counsel For Maintenance Of Patent Rights Pursuant To 11 U.S.C. §327(e) [ECF No. 45] (“Cassan Employment Application”); (3) Application To Employ Hogan Lovells US, LLP, As Special Litigation Counsel For F.D.A. Approval Process Pursuant To 11 U.S.C. §327(e) [ECF No. 49]

¹Unless otherwise defined herein, all capitalized terms have the meanings ascribed them in the underlying motions.

1 (“Hogan Employment Application”); And (4) Motion To Limit Notice And Establish Notice
 2 Procedure [ECF No. 51] (“Limit Notice Motion”), (collectively, “Motions”). The Trustee respectfully
 3 requests that this Court grant the Motions and enter orders approving and authorizing the following:

4 **Application To Employ William M. Holland As Special Accountant [ECF No. 43]**

5 As set forth in the Holland Employment Application, the Trustee requests Court authorization
 6 to employ William M. Holland as Special Accountant for Trustee *nunc pro tunc* to June 1, 2018,
 7 pursuant to section 327(a) of the Bankruptcy Code and Fed.R.Bankr. P. 2014(a), to assist the Trustee
 8 with preparation of monthly operating reports and related accounting matters.

9 **Application To Employ Cassan Maclean As Special Litigation Counsel For Maintenance Of**
 10 **Patent Rights Pursuant To 11 U.S.C. §327(e) [ECF No. 45]**

11 As set forth in the Cassan Employment Application, the Trustee requests Court authorization
 12 to employ the law firm CASSAN MACLEAN as special litigation counsel to the Trustee *nunc pro tunc* to
 13 June 8, 2018, pursuant to section 327(a) and 328(a) of the Bankruptcy Code and Bankruptcy Rule
 14 2014(a) to assist with maintenance of patent rights held by the bankruptcy estate through mid-
 15 September 2018 in exchange for advance payment of USD\$13,000.00. The employment terms are set
 16 forth with more particularity in the Application and patent summary attached to the Cassan
 17 Employment Application as Exhibit “1.”

18 **Application To Employ Hogan Lovells US, LLP, As Special Litigation Counsel For F.D.A.**
 19 **Approval Process Pursuant To 11 U.S.C. §327(e) [ECF No. 49]**

20 As set forth in the Hogan Employment Application, the Trustee requests authorization to
 21 employ HOGAN LOVELLS US, LLP as special litigation counsel to the Trustee *nunc pro tunc* to June
 22 15, 2018, pursuant to section 327(a) and 328(a) of the Bankruptcy Code and Bankruptcy Rule
 23 2014(a) to assist with the process for approval of the Debtor’s technology by the United States
 24 Food & Drug Administration (FDA). The employment terms and scope of service are set forth
 25 with more particularity in the Hogan Employment Application and list of proposed services
 26 attached to the Hogan Employment Application as Exhibit “1.”

27 **Motion To Limit Notice And Establish Notice Procedure [ECF No. 51]**

28 As set forth in the Limit Notice Motion, pursuant to Fed. R. Bankr. P. 2002(i) and (m), the

Trustee requests an order (1) limiting notice of matters in this case (except where general notice is required by the Federal Rules of Bankruptcy Procedure or this Court's Local Rules) to certain parties who will be included in a Limited Service List (the "Limited Service List") as more fully set forth in the Limit Notice Motion, and (2) authorizing the establishment and maintenance of such Limited Service List as more fully set forth in the Limit Notice Motion.

A Limited Service List as of the date of the filing of the Limit Notice Motion is attached to the Limit Notice Motion as Exhibit "1," but is subject to change as the case progresses.

The Trustee further requests an order permitting parties to be added to or deleted from Limited Service List upon filing a written request with the Court as more fully set forth in the Limit Notice Motion.

Any Oppositions must be filed pursuant to Local Rule 9014(d)(1).

Local Rule 9014(d)(1): . . . any opposition to a motion must be filed, and service of the opposition must be completed on the movant, no later than fourteen (14) days preceding the hearing date for the motion. The opposition must set forth all relevant facts and any relevant legal authority. An opposition must be supported by affidavits or declarations that conform to the provisions of subsection (c) of this rule."

If you object to the relief requested, you *must* file a WRITTEN response to this pleading with the court. You *must* also serve your written response on the person who sent you this notice.

If you do not file a written response with the court, or if you do not serve your written response on the person who sent you this notice, then:

- The court may *refuse to allow you to speak* at the scheduled hearing; and
- The court may *rule against you* without formally calling the matter at the hearing.

Copies of the Motions may be obtained by accessing PACER through the United States Bankruptcy Court website for Nevada at www.nvb.uscourts.gov, or by contacting Schwartzer & McPherson Law Firm, in writing, at 2850 South Jones Boulevard, Suite 1, Las Vegas, Nevada 89146, by email: BKFilings@s-mlaw.com; or by fax: (702) 892-0122.

NOTICE IS FURTHER GIVEN that the hearings on the Motions may be continued without further notice.

NOTICE IS FURTHER GIVEN that the hearings on the Motions will be held before a United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas Boulevard South, 3rd Floor, Las Vegas, Nevada on **July 19, 2018 at 11:00 a.m.**

/s/ Jason A. Imes
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